# REMARKS

Claims 1-22 are pending in the application. Claims 1-3 and 5-22 are withdrawn from consideration.

Claim 4 is objected to because of informalities indicated by the Examiner and also rejected under 35 U.S.C.§102 as being anticipated by AAPA (Applicant's Admitted Prior Art).

In response to the Office Action the drawings have been corrected and a new title of the invention as suggested by the Examiner has been submitted.

Claim 4 has been amended to more clearly define the present claimed invention.

In the Office Action Prior Art Figs. 26-31 of this application are referred to are argued that these Figs. disclose the same moving picture encoding method as specified in claim 4.
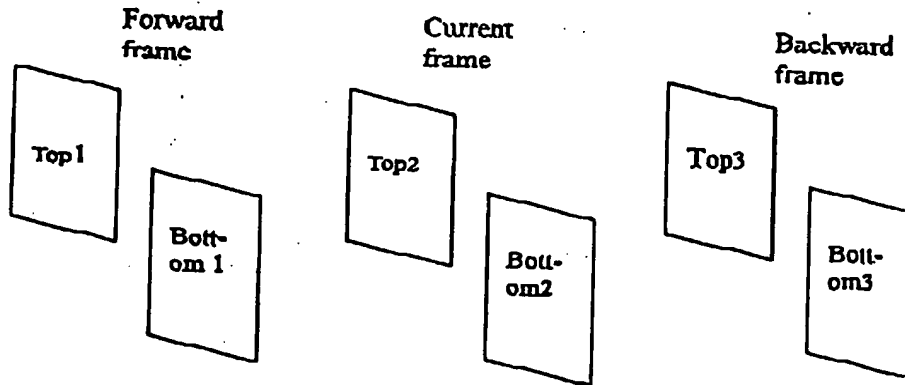
However it is respectfully submitted, as set forth in page 10, lines 5-10, the object of the present claimed invention is to provide moving picture encoding efficiency and good picture quality encoding even when there exists a picture where a scene change occurs between the odd/even fields within an interlaced frame.

To achieve that object, according to the present claimed invention recited in claim 4, the step-of "encoding each of the odd and even number interlaced images in a field structure, when the scene change is detected" is performed in the claimed method. This is not disclosed by the AAPA as explained below.
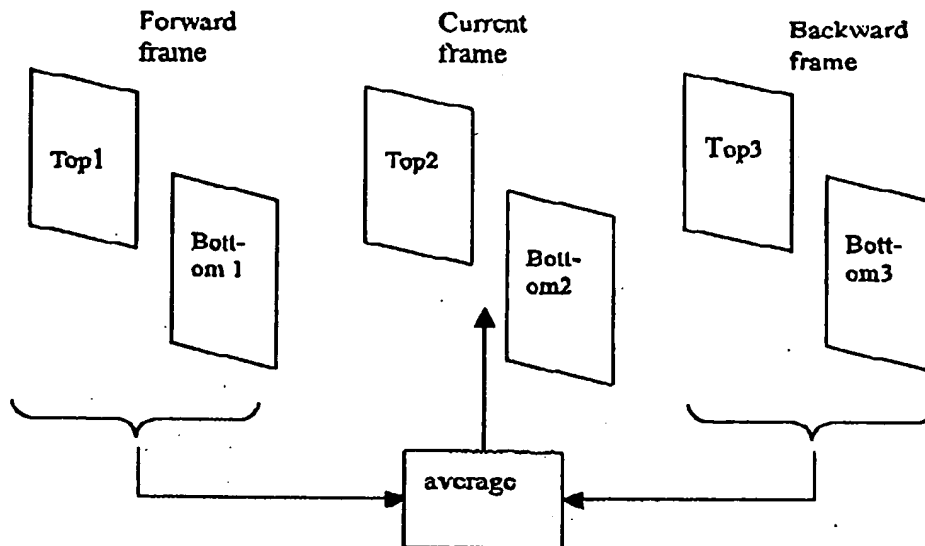
It should be noted that in the case of frame structure, two alternative methods have been provided, by which a picture is predicted from both the directions of forward frame and backward frame, according to MPEG-2 (ISO/IEC13818-2) as follows:

1.  Frame prediction (prediction is performed from two frames, one including Top 1 & Bottom 1 and the other including Top 3 & Bottom 3),

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2. Field prediction (Top 2 and Bottom 2 fields are respectively predicted from both the forward prediction field of Top 1 or Bottom 1 and the backward prediction field of Top 3 or Bottom 3).



If a scene change occurs between Top 2 and Bottom 2, it may be naturally considered that Top 1, Bottom 1 and Top 2 have the same first scene, while Bottom 2, Top 3 and Bottom 3 have a second scene, which is different from the first scene. However, the above conventional methods which predict from both the forward and backward directions necessarily require to have the operation of averaging forward referenced picture and backward referenced picture as shown in the following drawing, and thus, effective and good prediction can not be obtained because of the different scenes of Top 1, Bottom 1 and Top 3, Bottom 3.

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Forward frame: Top1, Bottom 1
Current frame: Top2, Bottom2
Backward frame: Top3, Bottom3
average

In the first case shown above, blocks are averaged to predict a picture from the both directions, which blocks are chosen by prediction of moving frames composed of Top 1, Bottom 1, and Top 3, Bottom 3.

In the second case shown above, averaging the forward prediction by Top 1 or Bottom 1 and the backward prediction by Top 3 or Bottom 3 is performed for Top 2 and Bottom 2, respectively.

Accordingly, the prediction such as shown in Fig. 1 of the present application is considered to be effective. It is the method of claim 4 that realizes such prediction, and then, the field of Top 2 can be predicted in the forward direction from Top 1 or Bottom 1, while the field of Bottom 2 can be predicted in the backward direction from Top 3 or Bottom 3, so that effective prediction becomes possible by similar scenes, such as Top 2 of the scene before the scene change and Bottom 2 of the scene after the scene change.
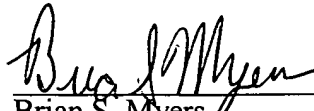
Accordingly it is respectfully submitted that current claim 4 is patentably distinguished over the prior art.

In view of the remarks set forth, above, this application is in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this

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application not to be in condition for allowance, the Examiner is respectfully requested to telephone

the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully submitted,

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